

Exhibit D



Frontier's first draft.

DAVID G. HOSENPUD
503.778.2141
hosenpudd@lanepowell.com

January 10, 2022

By ECF

The Honorable Louis L. Stanton
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: *Frontier Airlines v. AMCK Aviation, et al.*, No. 20 Civ. 09713 (LLS) (S.D.N.Y.)

Dear Judge Stanton:

This office, along with Binder & Schwartz LLP, represent Plaintiff Fronter Airlines, Inc. ("Frontier") in the above-captioned matter. We write with the consent of counsel for Defendants to request that the Court approve a 32-day extension of the deadline to complete document productions, from January 10, 2022, to February 11, 2022. Counsel for Defendants has agreed to this request.

Both parties have diligently worked to meet the January 10, 2022 document production deadline and thousands of pages of documents have been produced as of this date. However, a recent development makes a further extension necessary.

At the end of December 2021, Frontier became aware that Defendant AMCK Aviation Holdings Ireland Limited ("AMCK") is selling all of its aviation assets to Carlyle Aviation Partners and/or Maverick Aviation Partnership LP (collectively, "Carlyle"), and that this asset sale will include all the Frontier aircraft currently on lease and at issue in this lawsuit. Shortly thereafter, on January 4, 2022, Frontier propounded a second set of interrogatories and requests for production on AMCK regarding this development, including potential effects on this lawsuit. Even though Frontier sent this second set of discovery requests within days of learning about the asset sale, under the Federal Rules of Civil Procedure 33 and 34, AMCK's responses and document production are not due until February 3, 2022—24 days after the current document production deadline.

The parties have met and conferred and agreed to extend the document production deadline to February 11, 2022. This extension will provide Frontier with sufficient time to review and, if necessary, follow up on any questions regarding AMCK's February 3 responses and document production.

The Honorable Louis L. Stanton
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We therefore respectfully request an extension of the document production deadline to February 11, 2022. This is the second request to extend the document production deadline. *See* Dkt. # 67.

Respectfully submitted,

DATED: January 10, 2022

LANE POWELL PC

By: /s/ David G. Hosenpud
David G. Hosenpud (*pro hac vice*)
Aaron Schaer (*pro hac vice*)
601 SW Second Avenue, Suite 2100
Portland, Oregon 97204-3158
Telephone No.: 503.778.2100
Facsimile No.: 503.778.2200
hosenpudd@lanepowell.com
schaera@lanepowell.com

- and -

BINDER & SCHWARTZ LLP

Neil S. Binder
366 Madison Avenue, 6th Floor
New York, New York 10017
Telephone No.: 212.510.7008
Facsimile No.: 212.510.7299
nbinder@binderschwartz.com

Attorneys for Plaintiff Frontier Airlines

APPROVED.

DATED: January ___, 2022

United States District Judge



AMCK's revision of Frontier's first draft.

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Dear Judge Stanton:

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This request for an extension arises from the fact that Frontier recently served additional document requests on Defendant AMCK Aviation Holdings Ireland Limited ("AMCK"). Under the Federal Rules of Civil Procedure, AMCK's responses and objections to these document requests are not due until February 3, 2022—24 days after the current document production deadline.

We therefore respectfully request an extension of the document production deadline to February 11, 2022. This is the second request to extend the document production deadline. *See* Dkt. # 67.

Respectfully submitted,

DATED: January 10, 2022

LANE POWELL PC

By: /s/ David G. Hosenpud
David G. Hosenpud (*pro hac vice*)

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Aaron Schaer (*pro hac vice*)
601 SW Second Avenue, Suite 2100
Portland, Oregon 97204-3158
Telephone No.: 503.778.2100
Facsimile No.: 503.778.2200
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Dear Judge Stanton:

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At the end of December 2021, Frontier became aware of a development with Defendants that could affect this lawsuit. Shortly thereafter, on January 4, 2022, Frontier propounded a second set of interrogatories and requests for production on AMCK regarding this development. Due to the timing of these events, under the Federal Rules of Civil Procedure 33 and 34, AMCK's responses and document production are not due until February 3, 2022—24 days after the current document production deadline.

The parties have agreed to extend the document production deadline to February 11, 2022 to permit the parties to work through any issues related to these discovery requests.

We therefore respectfully request an extension of the document production deadline to February 11, 2022. This is the second request to extend the document production deadline. *See* Dkt. # 67.

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January 10, 2022
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